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**North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091**

**James G. Martin, Governor
David T. Flaherty, Secretary**

January 17, 1989

**Ronald H. Levine, M.D., M.P.H.
State Health Director**

**Director of I & L
NREHA Department
Building 198, Stop 1
U.S. Marine Corps Air Station
Cherry Point, North Carolina 28533**

Attention: Mr. Gary Edwards:

**Reference: 100,000 Gallon Tank
Closure Plan Amendments
(Cherry Point MCAS)
NC1170027261**

Dear Mr. Edwards:

The Marine Corps Air Station's Soil Sampling and Analysis of the 100,000 gallon tank site has been reviewed and the results indicate that the soil samples were composited over a total depth of ten (10) feet, which does not adequately define discrete zones of contamination. Therefore, it can only be assumed that the soil is contaminated from zero to ten (10) feet.

If all the contaminated soil cannot be practicably removed or decontaminated, then USMC must close the tank system and perform post-closure care in accordance with the closure and post-closure care requirements that apply to landfills. In addition, for the purposes of closure and post-closure, such a tank system is then considered to be a landfill and all the requirements for landfills must be met. [40 CFR 265.198(b)]

As an alternative to excavating the soil or closing the tank system as a landfill, the soil could be resampled and analyzed (Appendix IX) at discrete intervals until no contamination is found. This will determine the depth of the contamination and the feasibility of successfully removing all contaminated soil.


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Mr. Gary Edwards
US Marine Corps Air Station
Cherry Point
January 17, 1989

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Please respond to the above comments by February 16, 1989 by submitting either a modified plan for closure as a landfill including a post-closure plan or a proposal for resampling to continue assessment of a clean closure alternative. If you have any questions, please contact Katherine Lew of my staff at (919) 733-2178.

Sincerely,



James A. Carter
Environmental Supervisor
Hazardous Waste Branch
Solid Waste Management Section

JAC/KAL/mb/0100-61-62

cc: John E. Dickinson, US EPA, Region IV
William F. Hamner
Katherine A. Lew
Kirk B. Pollard
George Garcia
Jerry Parks